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August 7, 2019

**BY ECF**

Honorable Margo K. Brodie  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza East, Courtroom 6F  
Brooklyn, New York 11201

Re: CHIP, RSA, et al. v. City of New York, et al., Docket No. 19-cv-04087

Dear Judge Brodie:

I am an attorney in the office of Zachary W. Carter, Corporation Counsel of the City of New York, counsel for Defendants the City of New York (“City”), David Reiss, Cecelia Joza, Alex Schwarz, German Tejada, May Yu, Patti Stone, J. Scott Walsh, Leah Goodridge, and Sheila Garcia, in their official capacities as Chair and Members, respectively, of the New York City Rent Guidelines Board (“RGB”) (collectively, “City Defendants”). The Complaint was served on the City Defendants on or around July 19, 2019, thus making the answer due on August 9, 2019. I write to respectfully request an extension of time to answer or otherwise respond to the Complaint to September 6, 2019. This is the City Defendants’ first request for an extension.

Counsel for Co-Defendant RuthAnne Visnauskas, Commissioner of the NYS Division of Housing and Community Renewal (“DHCR”), has indicated that they wish to join in the City Defendants’ request for an extension of time to answer or otherwise respond to the Complaint to September 6, 2019. This is their first request for an extension as well. Plaintiffs’ counsel has indicated that plaintiffs consent to the Defendants’ joint request.

The City Defendants seek an enlargement of time to obtain the information necessary to respond to the Complaint. In keeping with this Office’s obligations under Rule 11 of the Federal Rules of Civil Procedure, we need additional time to investigate the allegations of

the voluminous Complaint and confer with various client agency contacts, many of whom are out of the office on scheduled vacations at various times throughout the month of August.

For the foregoing reasons, we respectfully request that the Defendants' time to answer or otherwise respond to the Complaint be extended to September 6, 2019.

Thank you for your consideration herein.

Respectfully submitted,

/s/

Rachel K. Moston

Cc: Reginald R. Goeke, Esq. (via ECF)  
*Counsel for Plaintiffs*

Michael Berg, Esq. (via ECF)  
Jonathan Conley, Esq.  
*Counsel for Co-Defendant DHCR*